

CHARLES P. RANDALL

ATTORNEY AT LAW
1200 NORTH FEDERAL HWY., SUITE 209
BOCA RATON, FLORIDA 33432-2845
TELEPHONE (561) 750-5050
FAX (561) 750-7272
www.cprattorney.com
E-mail: chuck@cprattorney.com

CHARLES P. RANDALL
ADMITTED TO PRACTICE IN
FLORIDA & CALIFORNIA

July 12, 2010

VIA ECF

Honorable James Orenstein
U.S. Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

RE: Berkshire Settlements v. Ashkenazi, et al., 09-cv-6 (FB) (JO)

Dear Judge Orenstein:

I represent the Plaintiffs in the above captioned action. I am writing to request a short extension of the discovery cutoff, currently set for July 15, 2010, and advise you as to the status of other matters currently pending. The discovery extension relates to the final session necessary to complete the deposition of Mrs. Halpert. My opportunity to examine her is the last portion to be completed and I expect that it will be completed in approximately two (2) hours of direct examination. The parties are discussing suitable dates in August and there is no opposition to the discovery extension for this limited purpose.

It is my understanding that Mrs. Halpert has decided to take a default to the Plaintiffs' Fifth Amended Complaint and the Defendants Cross Claims. I am preparing a Rule 55 affidavit for the entry of a default by the Clerk.

The Fifth Amended Complaint has been served upon the two additional parties, Joel Eckstein and Global Life Settlements, Inc. on June 30, 2010. These Defendants have yet to answer or otherwise file a responsive pleading.

Finally, the Plaintiffs have pending a Rule 72(a) Motion pending before Judge Block that may allow a further deposition of John Hancock.

Thank you for your courtesy in this matter.

Sincerely,
Charles P. Randall
Charles P. Randall

OrensteinMotionExtendDiscovery07.12.10